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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BELFOR USA GROUP, INC., a Colorado
Corporation,

Plaintiff,

vs.

WELLS FARGO BANK, N.A., a Delaware
corporation; and TERESINA MAHONEY,
an individual,

Defendants.

Case No. 2:10-cv-01220-PMP-GWF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO COMPLETE
DISCOVERY
(FIRST REQUEST)**

Pursuant to LR 26-4, the parties submit the following Stipulation and Order for Extension of Time to Complete Discovery. The parties request that all outstanding discovery deadlines in this matter be extended pursuant to the following schedule.

A. Discovery Completed

The parties have exchanged initial disclosures. Further, Wells Fargo has propounded Requests for Production of Documents and Interrogatories upon Belfor and Belfor has propounded Requests for Production of Documents and Interrogatories upon Wells Fargo.

B. Discovery Remaining

Wells Fargo's responses to Interrogatories and Request for Production of Documents are due January 24, 2011. Belfor's responses to Wells Fargo's Requests for Production of Documents and Interrogatories are due January 24, 2011. Further, the parties wish to depose

Defendant Mahoney, and propound written discovery upon Mahoney. In addition, Wells Fargo may wish depose a PMK of Belfor. Belfor may wish to depose a PMK of Wells Fargo, American Family Insurance, subcontractors that worked on the Property and the City of Henderson.

C. Reasons Why Discovery Not Completed

Plaintiff filed an Amended Complaint on December 3, 2010, which included new causes of action, as permitted by the Court order granting Plaintiff's Motion for Leave to File First Amended Complaint. In addition, Plaintiff encountered difficulty serving Defendant Teresina Mahoney, resulting in a request to serve by publication. To date, Defendant Mahoney has not yet appeared in this matter. The parties desire additional time to conduct discovery as to the claims and allegations contained in the amended complaint and to propound discovery upon Defendant Mahoney.

D. Proposed Schedule for Completion of Discovery

	Old Deadline	New Deadline
Close of Discovery	2/25/2011	5/26/2011
Disclosure of Experts and Reports	12/27/2010	3/28/2011
Disclosure of Rebuttal Experts and Reports	01/26/2011	4/26/2011
Dispositive Motions	3/30/2011	6/24/2011
Pre-Trial Order	4/27/2011	7/25/2011

WHEREFORE, the parties respectfully request that the Court extend the discovery deadlines as outlined above.

Dated this 25th day of January, 2011

Dated this ____ day of January, 2011

JAFFE, RAITT, HEUER & WEISS

SNELL & WILMER LLP.

By: /s/ Eric A. Linden

By: 

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ORDER

IT IS SO ORDERED that the following new deadlines apply:

Close of Discovery 5/26/2011

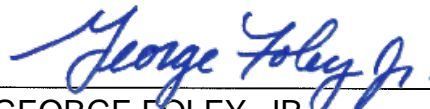
Disclosure of Experts and Reports 3/28/2011

Disclosure of Rebuttal Experts and Reports 4/26/2011

Dispositive Motions 6/24/2011

Pre-Trial Order 7/25/2011

DATED this 26th day of January 2011.

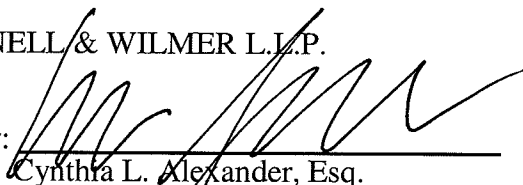


GEORGE FOLEY, JR.
United States Magistrate Judge

Submitted by:

SNELL & WILMER L.L.P.

By:



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